

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

PARIS GARDNER,

Plaintiff,

vs.

OFFICER BEN JOHNSON,
OFFICER STEVE JOHNSON, AND
THE CITY OF ROCKFORD, ILLINOIS,

Defendants.

No. 08 C 50006

Hon. Judge Frederick J. Kapala

Hon. Mag. Judge P. Michael Mahoney

Jury Trial Demanded

PARTIES' PROPOSED CASE MANAGEMENT ORDER

- I. Pursuant to Fed. R. Civ. P. 26(f), a meeting was held in 08 C 50006 on March 6, 2008 and was attended by:
 - A. Jennifer K. Soule, Attorney for Plaintiff Paris Gardner; and
 - B. Angela L. Hammer, Attorney for Defendants The City of Rockford, Illinois, Officer Ben Johnson and Officer Steve Johnson.
- II. The Fed. R. Civ. P. 26(a)(1) material will be exchanged by April 2, 2008.
- III. Alternative Dispute Resolution Mediation.
 - A. Consistent with the City's customary practice, the parties request this case be excused from ADR at this time.
- IV. Discovery Plan. The parties jointly propose to the Court the following discovery plan:
 - A. Discovery will be needed on the following subjects:
 1. Merits of plaintiff's claims and damages.
 - B. Maximum of 30 interrogatories by each party to any other party. Responses due 30 days after service.
 - C. The parties have agreed to a Maximum of 60 requests for admission by each party to any other party. Responses due 30 days after service.

- D. Maximum of 10 depositions by Plaintiff and 10 by Defendants(s) agreed at this time. However, plaintiff and Defendant reserve the right to seek agreement or Order of Court for additional depositions upon review of the pertinent records.
- E. The parties have not agreed to a time limitation on depositions, and will raise this issue with the Court.
- F. Fact discovery cut-off is set for December, 2008.
- G. At or before the close of fact discovery, the parties will inform the Court of whether an expert discovery schedule needs to be set.
- H. All discovery shall be cut off by: Reserved.
- I. Time for the parties to amend pleadings and add counts or parties is hereby established as May 1, 2008.
- J. The parties suggest the next discovery conference with the court be May 7, 2008.

All dispositive motions will be due 30 days after the fact discovery cut-off date unless otherwise ordered by the court and the parties agree pleadings, motions and briefs may be exchanged by e-mail, fax or other electronic means.

Respectfully submitted,

/s/ Jennifer K. Soule

Jennifer K. Soule, Attorney for Plaintiff

Date: March 10, 2008

Jennifer K. Soule
James G. Bradtke
Kelly K. Lambert
Soule, Bradtke & Lambert
155 North Michigan Avenue
Suite 504
Chicago, Illinois 60601
312-616-4422